

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE**

<b>UNITED STATES OF AMERICA</b>	)	
	)	
v.	)	<b>21-cr-21-SM</b>
	)	
<b>RYDER WINEGAR</b>	)	

**GOVERNMENT’S ASSENTED-TO MOTION TO CONTINUE TRIAL**

The United States of America, by its undersigned counsel, respectfully moves to continue trial in this matter 30 days to the April 2020 trial period. Grounds follow:

Defendant was charged by complaint with threatening members of Congress on December 21, 2020. A search warrant was issued that same day for defendant’s residence in New Hampshire, and was executed the following day, with several electronic devices seized by investigators for further analysis. Defendant was subsequently arrested on January 11, 2021, and has remained in custody since that date. An indictment charging him with six counts of threatening government officials in violation of 18 U.S.C. § 115(a)(1)(B), and one count of interstate threatening communications in violation of 18 U.S.C. § 875(c), was returned by a grand jury in Concord on February 8, 2021. The case is currently scheduled for a jury trial on March 16, 2021, and the Court has requested a status update by March 2, 2021.

The government’s review of the seized electronic devices by the primary investigative agency, the U.S. Capitol Police, continues as of this date but is expected to conclude shortly. To the extent the devices either contain, or fail to contain, information related to the charged offenses, they will be material to defendant’s guilt or innocence in this matter and will impact the parties’ ability to resolve this matter prior to trial. The brief requested continuance would allow this review to be completed, the government to disclose any materials consistent with its obligations under *Brady*, *Giglio*, and Rule 16, and the defendant and his counsel to review those

materials. Thus, the ends of justice in granting a continuance outweigh the best interest of the public and the defendant in a speedy trial under 18 U.S.C. § 3161(h)(7)(A).

Counsel for defendant, Charles Keefe, Esq., assents in the motion to continue.

In light of the nature of the relief sought, no separate memorandum of law is necessary under Local Rule 7.1.

Respectfully submitted,

SCOTT W. MURRAY  
United States Attorney

Dated: March 1, 2021

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